

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MADEL PA

Court File No.: 24-mc-00050-TNL

Plaintiff,

vs.

Deloitte Consulting LLP and Deloitte
Development LLC,

**SUPPLEMENTAL DECLARATION OF
JENNIFER M. ROBBINS
IN SUPPORT OF MOTION TO QUASH**

Defendants.

Pursuant to 28 U.S.C. § 1746, I, Jennifer M. Robbins, declare and state as follows:

1. I am the Managing Partner of the MADEL PA law firm (the “Madel Firm”) and am representing the Madel Firm with respect to the subpoena issued by Deloitte Consulting LLP and Deloitte Development LLC (together “Deloitte”) related to *Deloitte Consulting LLP et al. v. Sagitec Solutions LLC*, 23-cv-325 (D. Del.) (the “Underlying Litigation”).
2. Attached hereto as Exhibit 2 is a true and correct copy of a letter from Robins Kaplan LLP (Sagitec’s counsel in the Underlying Litigation) to Deloitte’s counsel in the Underlying Litigation “regarding several factual misstatements and mischaracterizations Deloitte made in its Opposition to Madel PA’s Motion to Quash filed in the District of Minnesota” and for which Robins Kaplan has “request[ed] that Deloitte clarify the factual record to” this Court. (See Exhibit 2 at 1.)

3. As noted in the motion for leave to file this declaration, we seek to provide this Court with the information in Exhibit 2 ahead of the hearing on the Madel Firm's motion to quash. The Madel Firm believes the information described and cited in Exhibit 2 provides helpful background as to Deloitte's statements regarding discovery in the Underlying Litigation, to which the Madel Firm is not a party.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 5, 2024

/s/ Jennifer M. Robbins

Jennifer M. Robbins